

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA**

NORTHERN DYNASTY
MINERALS LTD. and PEBBLE
LIMITED PARTNERSHIP,

Plaintiffs,

v.

U.S. ENVIRONMENTAL PROTECTION
AGENCY,

Defendant.

Case No. 3:24-cv-00059-SLG

DECLARATION OF WAYNE WALTER RICHARDSON

I, Wayne Richardson, state and affirm as follows:

1. My name is Wayne Walter Richardson. I live in Napa, California, and am currently the CEO/General manager for Turley Wine Cellars in St. Helen, Templeton, and Plymouth California. I have a BA in Communications from California State University, Fresno.

2. I make this declaration in support of the National Parks Conservation Association's (NPCA) Motion to Intervene in the above-captioned litigation. I know these facts of my own personal knowledge and would competently testify to them if called as a witness in these proceedings.

3. I am a member of NPCA and have been since September 1, 2010.

DECL. OF WALTER RICHARDSON

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4. I support NPCA because I grew up spending a lot of time hunting and fishing with my dad. I have witnessed sadly firsthand diminishing open spaces and shrinking wildlife populations I grew up enjoying. I have worked in and explored Alaska for some 30-plus years. I fell in love with Alaska from my first visit. I have fished Bristol Bay, Homer, Ketchikan, the Kenai and have visited Denali National Park. I worked on an Iditarod checkpoint at Rainy Pass Lodge and kayaked 7 days through Glacier Bay National Park. I have also visited Kodiak Island and fished there as well. I have been fortunate to have visited some of the most pristine and wild places left in Alaska and on earth. This is what makes our planet different than any other barren planet in the solar system, and I support NPCA's work to protect these wild lands, including NPCA's work to oppose Pebble Mine.

5. The Bristol Bay watershed is one of the great unsung natural wonders of the world. The beauty of these crystal-clear rivers with abundant, spectacular, wondrous, beautiful, fish—probably unchanged for hundreds of thousands of years—is mind boggling to me, and the fishing was so amazing that it didn't seem real in this day and age. The wildlife in Bristol Bay, from moose, bears, foxes, wolves is breathtaking. Upon my arrival back to California from my first trip to the Bristol Bay watershed, I could not stop thinking about the beauty of the area and how it needs to be protected from short-sighted economic gains and planet-altering environmental destruction. I could not wait to go back.

6. I went on a seven-day fly-fishing trip at Rainbow River Lodge in the heart of the Bristol Bay watershed, in July of 2018. I fished the Middle of the Copper, Illiama,

Nush, Gibraltar and Moraine. We flew on float planes everyday throughout the Bristol Bay region, and fly fished (boat and wading) for eight hours every day. I plan to return to go fly fishing as often as I can afford it. It is too expensive of a trip to go every year but worth every penny to experience life-changing beauty and see what the world used to look like. If the proposed Pebble Mine were built, I would not want to go back—it would break my heart to see the impact to this beautiful pristine environment.

7. By the good grace of God and many dedicated people the Pebble Mine project has been defeated for now. My wife and I returned to Bristol Bay and fished at the Kulik Lodge in 2021 and returned in 2022 and fished at the awesome Sportsman's Lodge on the Kvichak River in Bristol Bay. Our next trip to Bristol Bay Alaska to go fly fishing is planned for 2025.

8. It is important to me to be involved in this lawsuit because the Environmental Protection Agency (EPA) does not adequately represent my interests. In the past, EPA reversed course and withdrew its 404(c) Proposed Determination after a change in administration in 2017. EPA leadership could change again during the pendency of this lawsuit, especially in light of the upcoming November 2024 election. I believe it is critical to defend the Final Determination and EPA's finding that the proposed Pebble Mine poses unacceptable risks to the Bristol Bay watershed. The plaintiffs in this litigation seek to reverse EPA's important decision protecting the Bristol Bay region, and this would have devastating impacts on my personal enjoyment and subsistence use of the Bristol Bay area.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 14 day of May, 2024 in Napa, California.

A handwritten signature in blue ink, reading "Wayne Walter Richardson", is written over a horizontal line.

Wayne Walter Richardson